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MOSER LAW FIRM, P.C.



October 30, 2020

**VIA ECF**

Hon. Cheryl L. Pollak, USMJ  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Fuentes v. GGNGJG Enterprises, Inc.*, 19-cv-7113(GRB)(CP)

Dear Judge Pollak:

Please accept this joint status report and proposed discovery schedule regarding the above referenced matter.

The parties have, despite diligent efforts, been unable to settle this matter. The parties jointly propose the following discovery schedule:

1. First requests for production and interrogatories to be served on or before November 27, 2020.
2. Responses to first requests for production of documents and interrogatories to be served on or before December 28, 2020.
3. Discovery to be completed on or before April 30, 2021.

Respectfully submitted,

Steven J. Moser